

**LAW OFFICE OF CLIFFORD OLSHAKER, P.C.**

40-47 75TH STREET, 2ND FL  
ELMHURST, NEW YORK 11373

PHONE: (718) 429-2505  
FASCIMILE: (718) 429-2096  
CLIFFORDOLSHAKER@YAHOO.COM

June 5, 2024

*Via ECF*

Hon. Nicholas G. Garaufis  
United States District Court Judge  
United States District Court  
for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Miami Home LLC v. Magda Viera; 18-cv-1398 (NGG)(SJB)

Your Honor:

I represent Magda Viera, defendant in the above-referenced foreclosure action ("Defendant"). Defendant's *pro-se* bankruptcy case (24-41199; EDNY) was dismissed on May 10, 2024 and there is no longer a stay in effect. Plaintiff Miami Home LLC ("Plaintiff") has scheduled a foreclosure date for June 27, 2024. Presently, the parties are actively negotiating a forbearance agreement that would end this case and allow Defendant to keep her home. Accordingly, I respectfully request that this Court hold Defendant's March 15, 2024 letter request for a pre-motion conference (**ECF No. 53**) in abeyance until June 14, 2024 to give the parties time to hopefully finalize an agreement that will resolve this matter.

Sincerely,



Clifford Olshaker

**CERTIFICATE OF SERVICE**

The undersigned certifies that on June 5, 2024, a copy of the foregoing letter reply was served via ECF on the following parties:

Margolin, Weinreb & Nierer, LLP  
Attorney for Miami Home LLC  
165 Eileen Way, Suite 101  
Syosset, NY 11791(516) 921-3838